



EX PARTE OR LATE FILED

ORIGINAL ORIGINAL

Lisa B. Smith
Senior Policy Counsel/Director

1133 Nineteenth Street, NW
Washington, DC 20036
202 887 2992
Fax 202 736 6359

February 14, 2001

BY HAND

William Caton, Acting Secretary
Federal Communications Commission
445 Twelfth Street, S.W. - Suite TW-A325
Washington, D.C. 20554

RECEIVED

FEB 14 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Written Ex Parte Presentation*
In the Matter of Performance Measurements and Standards for Interstate
Special Access Services, CC Docket No. 01-321

Dear Mr. Caton:

WorldCom submits the attached written *ex parte* presentation into the above-referenced docket.

Pursuant to section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1), an original and one copy of this presentation is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

Lisa B. Smith

Attachment

cc: Uzoma Onyeije

No. of Copies rec'd 2
LBIABODE

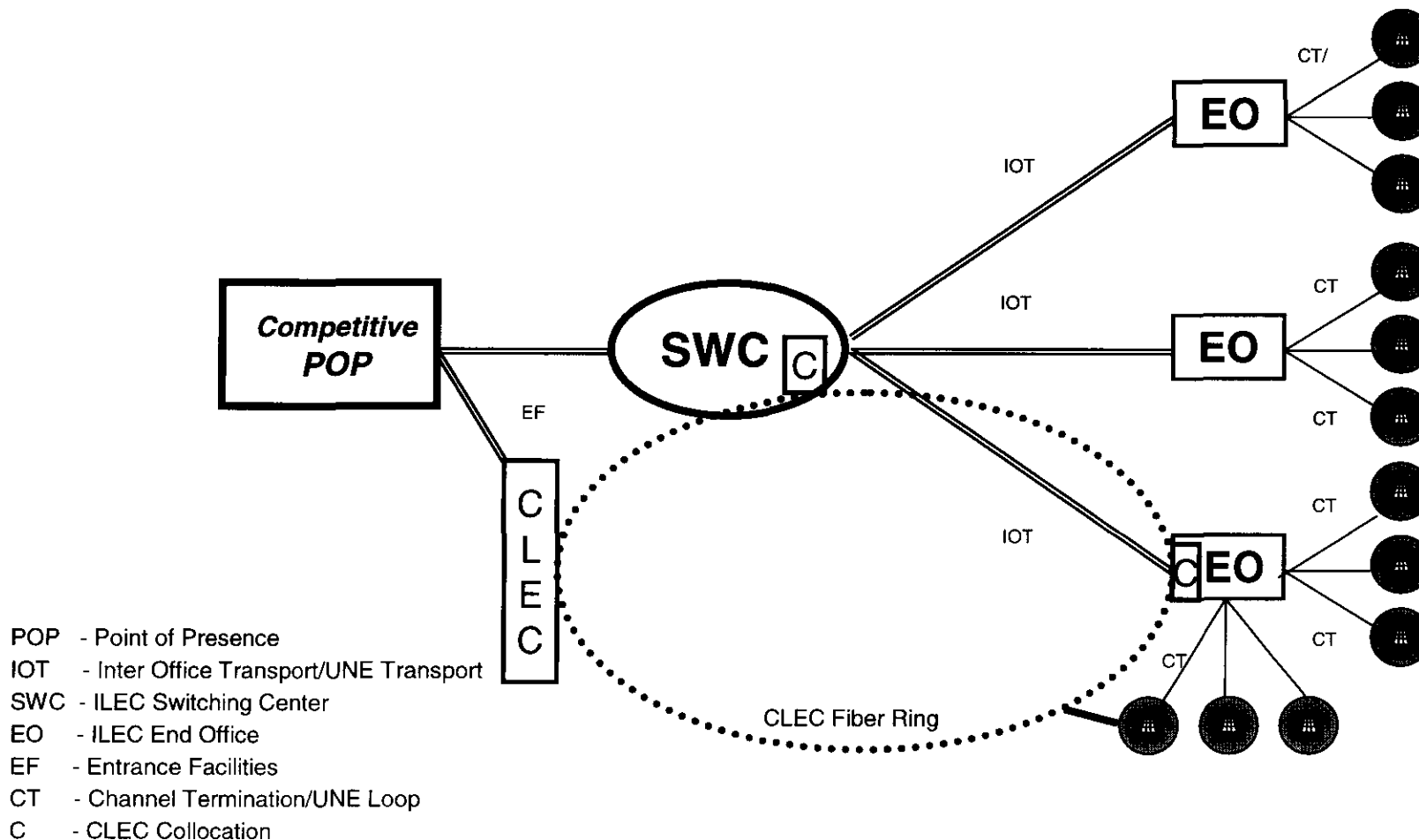
ILEC Special Access: The Critical Need for Performance Measurements and Standards



Presentation to the NARUC Staff
Subcommittee on Telecommunications
February 2002

Special Access is:

- Dedicated (unswitched) link between the IXC/CLEC and its end-user
- Provided via the same facilities used to supply UNE loops and transport
- Usually the sole means for connecting to end user customers



Why not use UNEs (EELs) instead of Special Access?

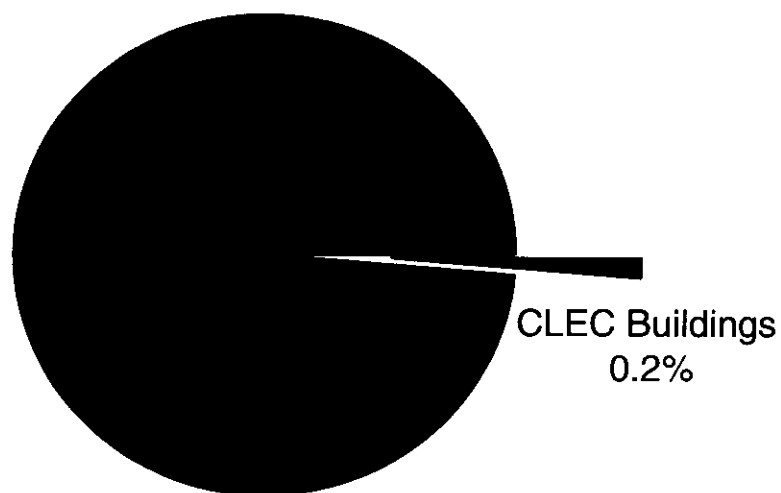
- No “new construction” or “new combinations”
- No “conversions” or “co-mingling”
- ILECs play “hard to get” on EELS

Improving ILEC Accountability for Special Access Provisioning is a Business Imperative

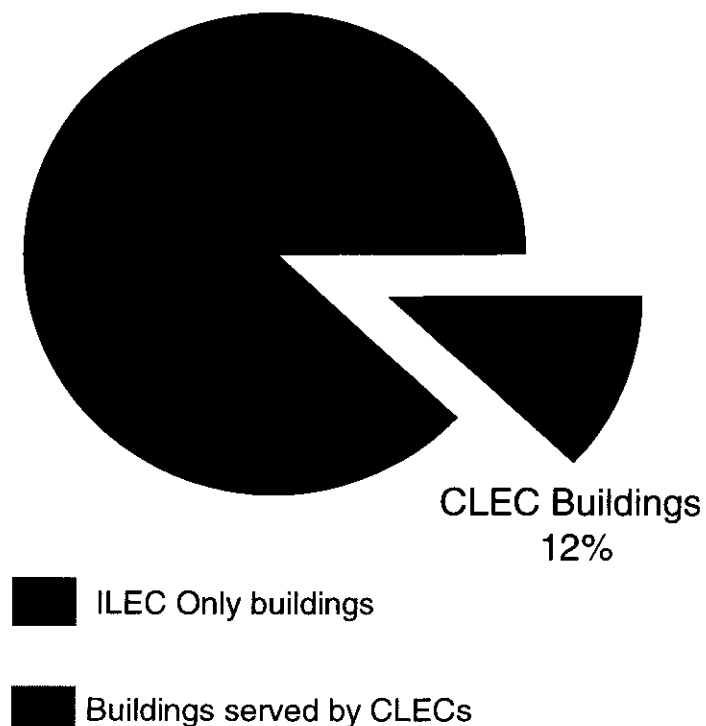
- Facilities-based competitive carriers with widely-varying business models share one common characteristic: they are heavily dependent on monopoly ILEC special access service to reach their business customers
- Chronic ILEC provisioning problems result in increased costs, revenue loss, harm to reputation, and customer “defections” back to the ILEC
- Absence of performance metrics for special access allows unpredictable service delivery, with no meaningful recourse
- ILECs have clear incentive and ability to discriminate, which will increase after 271 approval

Even in the Most Competitive Areas, CLECs Serve a Small Fraction of Total Buildings

Building Coverage in 23 Major MSAs



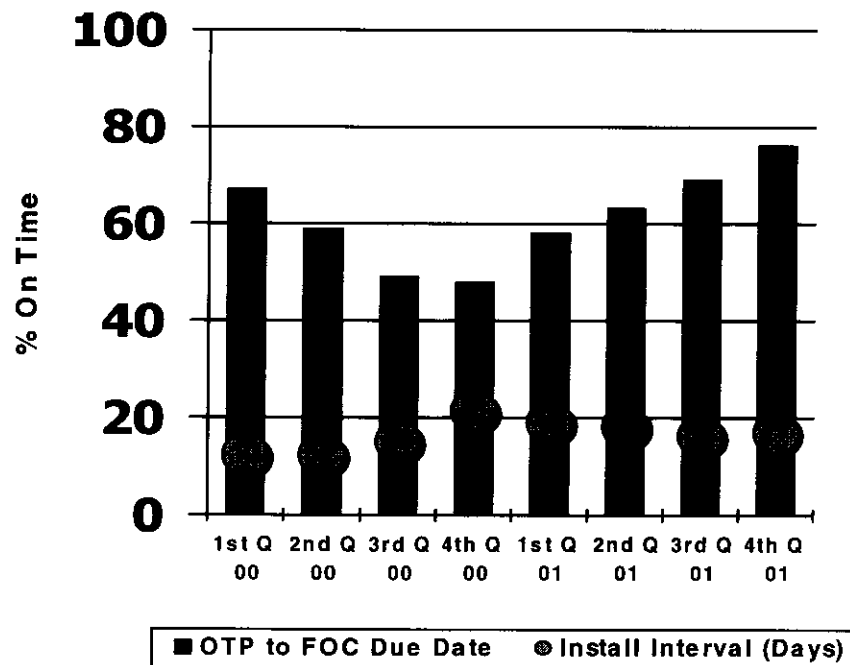
WorldCom Experience in Most Competitive Serving Areas



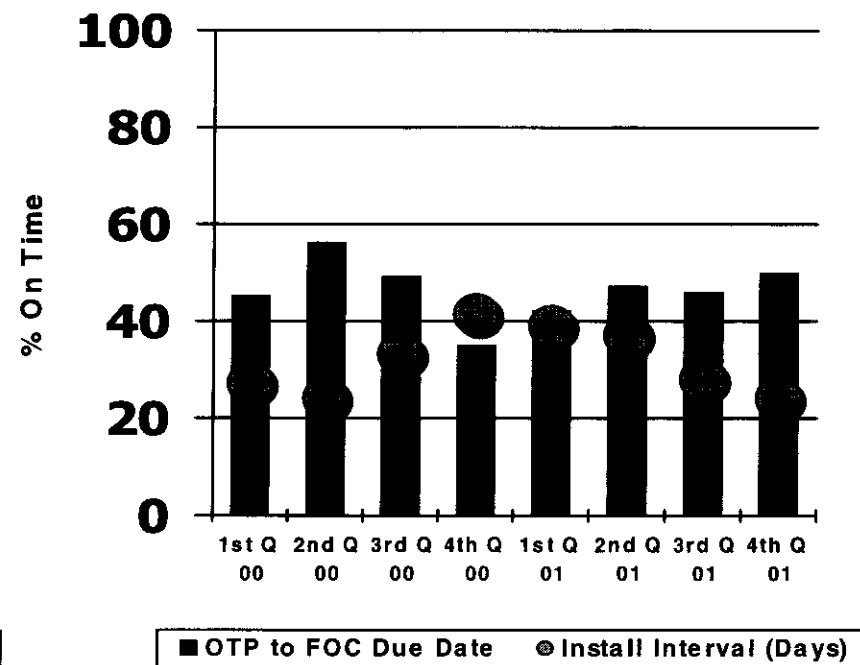
ILEC Average Special Access Provisioning Performance

On Time Performance (OTP) and Installation Interval

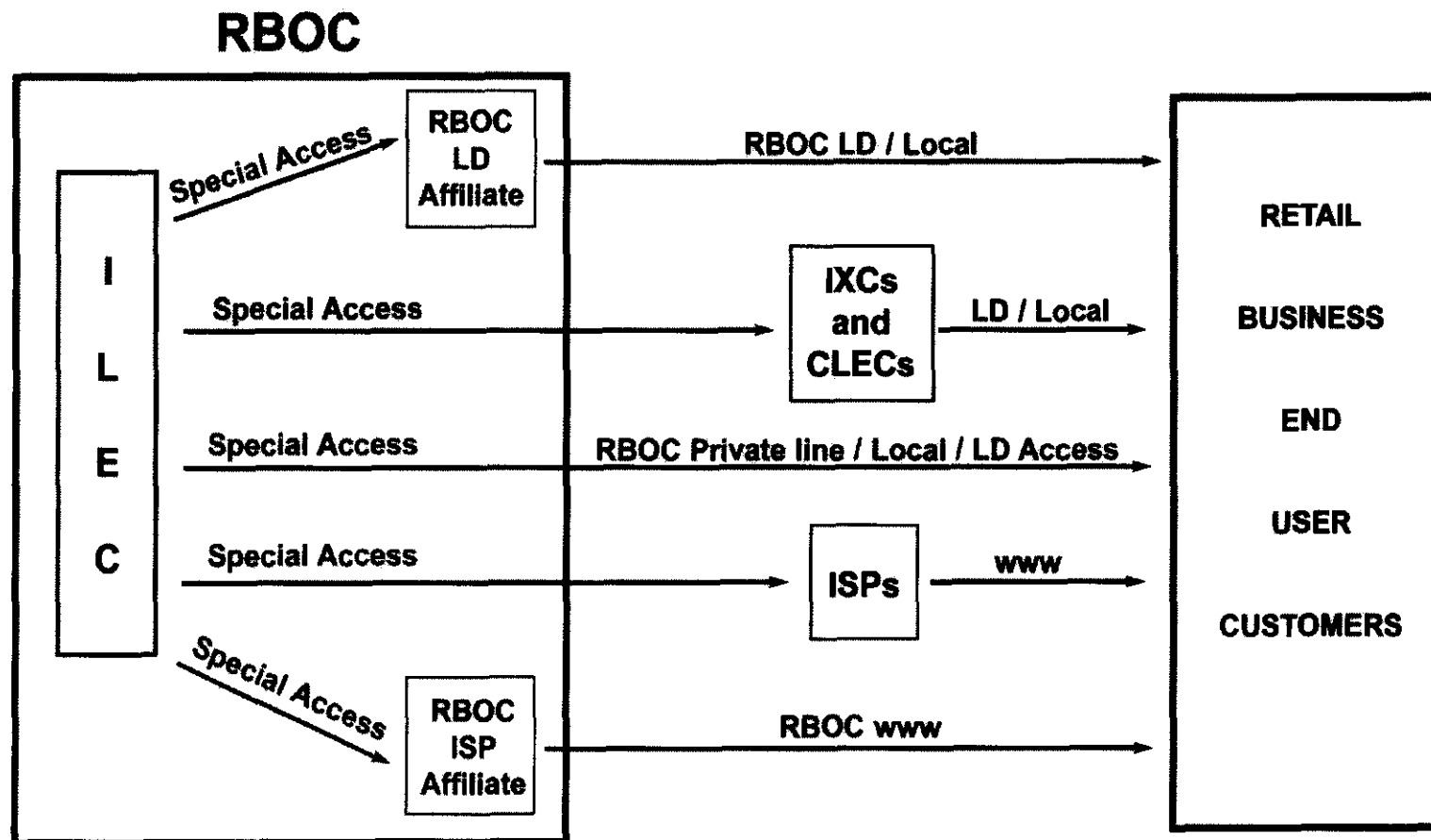
DS1



DS3



OPPORTUNITY AND INCENTIVE FOR DISCRIMINATION IN RBOC SPECIAL ACCESSSS PROVISIONING



Findings from a Recent Comprehensive Review of Verizon Special Services by the New York Public Service Commission

- Services are critical to the development of local competition, and to the NY economy
- VZ remains the dominant provider of special services
- VZ's provisioning performance is "significantly below target"
- VZ treats other carriers less favorably than its own end users
- FCC should take action with regard to interstate circuits

What is WorldCom Seeking From State Commissions?

- FCC NPRM asks for comment on “the extent to which state commissions could play a role regarding interstate special access services.”
- WCOM believes the states have a vital role to play in reviewing **all** RBOC special access services
 - Emphasize importance to state’s businesses and economy
 - Review level of “last mile” market power in your state
 - Adopt/support strong, reliable Performance Measures and Standards
 - Inquire into potential discrimination issues